

REMARKS

The Applicant has filed the present Response in reply to the outstanding FINAL Official Action of January 30, 2004, and the Applicant respectfully submits that the Response is fully responsive to the Official Action for reasons set forth below in detail.

In the FINAL Official Action, the Examiner rejected Claims 7-8 pursuant to 35 U.S.C. §103(a), as allegedly unpatentable over Takita, *et al.* (U.S. Patent No. 6,151,005) (hereinafter "Takita") in view of Komo (U.S. Patent 6,490,013) (hereinafter "Komo"). We respectfully disagree with the Examiner's contention and traverse the rejection with at least the following analysis.

Claim 7 is directed to a liquid crystal display comprising, inter alia, a liquid crystal display controller with an inverter for inverting a digital image input signal and a selector for choosing and outputting a signal inverted by said inverter and said digital image input signal depending on a switching signal, a liquid crystal driver for transmitting the digital image input signal data-processed to the liquid crystal panel using electric power supplied by the gradation power source, and a micro processor or a dual in-line package switch outputting a switching signal for inputting the switching signal to the selector depending on the liquid crystal panel.

The hypothetically combined Takita-Komo system fails to teach (a) a selector for choosing and outputting a signal inverted by said inverter and said digital image input signal depending on a switching signal, and (b) a microprocessor or a dual

in-line package switch outputting a switching signal for inputting the switching signal to the selector depending on the liquid crystal panel.

The Examiner stated that Komo teaches a multiplexer for alternatively selecting a non-inverted signal and an inverted signal based on an inversion control signal. A multiplexer is not the inverter-selector configuration as the claim specifically recites. The Examiner contended that one would have been motivated to substitute the claimed inverter-selector configuration from the disclosed multiplexer of Komo since they are functionally equivalent and Komo suggests this equivalent nature.

In order to rely on equivalence as a rationale supporting an obviousness rejection, the equivalency must be recognized in the prior art, and cannot be based on the applicant's disclosure or the mere fact that the components at issue are functional or mechanical equivalents. In re Scott, 139 U.S.P.Q. 297.

Accordingly, the Applicant submits that the Examiner solely bases the equivalents contention on the fact that the structures are functionally equivalent when used in the claimed manner. This equivalence was not known at the time of the invention, and therefore the rejection is based on hindsight. This contention is not enough to maintain a case of obviousness.

Further, Komo does not suggest that a multiplexer is functionally or mechanically equivalent to the claimed inverter-selector configuration. Therefore, the Examiner has not met his burden to show that this equivalency is known in the art.

Applicant further submits that the Examiner has failed to establish that the hypothetically combined system has a microprocessor or a dual in-line package switch outputting a switching signal for inputting the switching signal to the selector depending

on the liquid crystal panel. Komo only teaches that the multiplexer selects a non-inverted signal and an inverted signal based on an inversion control signal, however, Komo does not teach or suggest a microprocessor or a dual in-line package switch outputting a switching signal depending on the liquid crystal display. Komo does not teach the source of the control signal or a relationship between such a signal and the liquid crystal display.

The Applicant further believes that contrary to Takita's Fig. 41, which is directed to selecting a set of nine voltage levels from two sets of voltage levels based on the alternating signal in order to drive the liquid crystal panel (See Takita Col 42, lines 22-51), the claimed invention is directed to selecting the display data for the type of liquid crystal panel, i.e., either the digital input signal or the inverted signal, based on a switching signal which is a function of the liquid crystal panel mode. Furthermore, contrary to Takita that teaches the selected set of nine voltage levels connected to signal driving groups 4106 and 4107 to drive the liquid crystal panel, the claimed invention transmits either the digital image input signal or the inverted digital image input signal to a data processor, which data processes the image signal and transmits the data-processed image signal to the liquid crystal driver.

In view of the above, we believe that Takita in view of Komo does not teach or suggest the invention as claimed in Claim 7.

With respect to Claim 8, the Examiner rejected the claim as being unpatentable over Takita in view of Komo and in further view of Takahara et al. U.S. Patent No. 5,196,738 (hereinafter "Takahara"). The Examiner asserted that Takahara teaches a plurality of power source voltage terminals which have different potential levels, and an output terminal for providing a voltage to a display panel according to the

voltages applied through the voltage terminals. Therefore, it would have been obvious to one of ordinary skill in the art to further modify Takita's LCD system to included Takahara's plurality of power source terminals.

We respectfully disagree with the Examiner's rejection and traverse the rejection based upon the above-identified analysis and for at least the following additional reason. Claim 8 recites, inter alia, a LCD panel further comprising plural gradation power sources which are *prepared corresponding to types* of liquid crystal panels, and *are selected depending* on the liquid crystal panels to be used. Takahara fails to teach or suggest the relationship between the plural gradation power sources and the LCD panels to be used. Takahara solely teaches using different potential voltages. Therefore, the combined prior art references fail to teach each and every claim limitation or render the limitations obvious.

Accordingly, the Applicant respectfully requests that the Examiner withdraw the rejection under 35 U.S.C. § 103(a) of Claims 7-8.

In view of the foregoing, the Applicant believes that the above-identified application is in condition for allowance and henceforth respectfully solicits the allowance of the application. If the Examiner believes a telephone conference might expedite the allowance of this application, the Applicant respectfully requests that the

Examiner call the undersigned, Applicant's attorney, at the following telephone number:

(516) 742-4343.

Respectfully submitted,



Seth Weinfeld

Registration No: 50,929

SCULLY, SCOTT, MURPHY & PRESSER

400 Garden City Plaza

Garden City, New York 11530

516-742-4343

SW:lf